Faick, Katherine@Waterboards

From: Melton, Jessica <JE11@pge.com> on behalf of Krausse, Mark <MCKd@pge.com>
Sent: Thursday, April 26, 2018 4:47 PM
To: Faick, Katherine@Waterboards
Cc: Jones, Kathleen (Law); Krausse, Mark
Subject: DCPP OTC Interim Mitigation Fee Submittal 2016-2017
Attachments: Attachment 1 - Diablo Canyon Intake Volumes(October 2016 - September 2017).pdf

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Ms. Faick:

In response to your December 12, 2017 letter regarding the OTC interim mitigation fee requirements for Diablo Canyon Power Plant for October 2016 through September 2017, Pacific Gas and Electric Company would like to continue to use the site-specific interim mitigation fee for Diablo Canyon established for 2015-2016. The information requested to calculate the fee is attached and further background on the information is provided below.

Valid Entrainment Data
Data previously submitted for Diablo Canyon was used by the SWRCB's consultant to calculate a site-specific fee for the plant which was then used along with entrainment data from other OTC plants to calculate an average interim mitigation fee for facilities without site-specific data. This Diablo Canyon fee of $3.12 MGD should be the starting point for determining the plant's fee.

Monthly and Total Intake Volume
Attachment 1 is the Plant OTC operational data for the October 2016 through September 2017 period formatted by month; same as was submitted for the October 2015 through September 2016 operational period.

The data was cross-checked/verified against same incorporated in NPDES Discharge Self-Monitoring Report & Plant CEC-1304 Schedule-3 submittals

Regarding additional-available and/or operational period specific impingement data; there is none. The following regarding plant impingement previously communicated to the SWRCB for interim mitigation fee calculation effectively remains current:

Actual Impingement Data
Diablo Canyon does not collect impingement data. It has long been recognized by the plant's technical work group and the Central Coast Regional Board that impingement is not an issue at Diablo Canyon. For the impingement portion of the interim mitigation fee, it is recommended that the Diablo Canyon impingement data included in the OTC policy SED be used, an average of 710 pounds per year.

We would be happy to meet with your team to discuss this information in more detail. If you have any questions, please give me a call.

Sincerely,

Mark Krausse
Director, State Agency Relations
O: 916-386-5709 M: 916-995-6827

Mark.Krausse@pge.com

Attachment 3

Pacific Gas and Electric Company
Diablo Canyon Monthly Intake Volume
October 1, 2016 – September 30, 2017

Month	OTC Intake Volume (MG)
October 2016	74,172
November 2016	74,279
December 2016	77,066
January 2017	75,654
February 2017	69,608
March 2017	73,494
April 2017	65,417
May 2017	39,649
June 2017	52,920
July 2017	77,066
August 2017	77,066
September 2017	74,580
TOTAL	**830,971**

Power plant operations logs track the start and stop times of individual intake circulating water pumps to the nearest minute. These logs are maintained each operating shift on a continuous basis (24/7/365). Plant OTC intake/effluent volumes are calculated using the hours/minutes each circulating water pump is operated, and the pumping capacity in gallons per minute (gpm) for each respective pump. Monthly intake volumes provided are the sum of the withdrawal volumes calculated for each pump operated during the respective calendar periods.

Due to the size and configuration of the seawater circulating system infrastructure at the Diablo Canyon Power Plant, it is impractical to install a flow metering device for direct monitoring of the intake withdrawal volume. The current method described above is the most reasonable means of obtaining accurate intake volumes for use in calculating the annual interim entrainment mitigation fee.

Additionally, the capacities of individual pumps were developed during early testing and operation of the equipment following installation. In general, pump capacities tend to degrade to some extent over their operating life due to normal wear and tear. Therefore, it is probable the withdrawal volumes derived using the original pump capacities are conservative, as the current capacities of the pumps have likely decreased over time.